

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

June 22, 2023

United States of America

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Nathan Ochsner, Clerk of Court

v.

)

Cristian Morris

)

Case No. 4:23-mj-1270

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)

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)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 8, 2023 to present in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------------------------|--|
| 18 U.S.C. 1591(a)(1) & (2) and (b)(1) | Sex Trafficking of Minors or with Force, Fraud or Coercion |

This criminal complaint is based on these facts:

See Attached Affidavit

 Continued on the attached sheet.


Thelma Donchig
Complainant's signature

Thelma Donchig, Special Agent FBI

Printed name and title

Sworn to before me telephonically.

Date: 06/22/2023



Peter Bray
Judge's signature

City and state: Houston, Texas

Hon. Peter Bray, US Magistrate Judge

Printed name and title

4:23-mj-1270**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Thelma Donchig, being duly sworn, hereby depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been since 2019. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law. I am currently assigned to the FBI Houston Human Trafficking Task Force (HTTF) and investigate a variety of human trafficking matters to include Violent Crimes Against Children. Prior to this assignment, I was assigned to the FBI Houston Field Office, Counterintelligence Branch where I investigated Economic Espionage and the Theft of Intellectual Property. I have been trained in the preparation, presentation, and service of criminal arrest and search warrants and have been involved in the investigation of offenses against the United States to include violent crimes against children and human trafficking offenses.
2. As described in the following affidavit, I submit there is probable cause to believe Cristian Morris violated 18 U.S.C. § 1591(a)(1) and (a)(2), (b)(2) which makes it a crime for someone who benefits, financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.
3. I am familiar with the information contained in the Affidavit based upon the investigation that myself and other law enforcement officers have conducted, and any of my conversations with other parties involved in this case.

4. Because the Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of a violation of 18 U.S.C. 1591 has been committed by Cristian Morris starting from approximately March 8, 2023, through present day. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
5. On or about March 30, 2023, FBI Houston received a report indicating that a specific 16-year-old female was missing and being sexually exploited in the Houston, TX area, which is in the Southern District of Texas. Throughout this affidavit this 16-year-old female will be referred to as Minor Victim 1¹ (herein after, MV1). MV1 had been reported to law enforcement as missing by a Human Trafficking Non-governmental organization and was seen posted in commercial sex advertisements in and around the Houston, Texas area.
6. On or about March 8, 2023, a family member verified to law enforcement that MV1 had run away. Further, on March 30, 2023, MV1's family member informed law enforcement that MV1 had reportedly reached out to them through social media. During this conversation MV1 told her family member that she had been sexually assaulted, threatened with a gun to her head, and was being forced to perform commercial sex acts against her will. MV1 requested that the family member cease communication with her as MV1 was with "bad people" and did not want them to discover the communications.

¹ The identification of MV1 is known to law enforcement but is not being disclosed in this document to protect the identity of MV1.

7. Law enforcement found an advertisement on MegaPersonals.com² which contained partially nude images of MV1³ and partially nude images of an 18-year-old female, previously reported to law enforcement as a victim of sex trafficking, referred to in this affidavit as Victim 1⁴ (herein after, V1). The advertisement was reviewed by your affiant and is described as follows: Partially entitled “2 girl Special or your pick of one” and was posted on March 13, 2023. It displayed two pictures of MV1 partially nude and bent over in a sexually suggestive manner along with one picture wherein MV1 is holding her breasts in a sexually suggestive manner through a shirt. It also displays three images of V1 partially nude and bent over in a sexually suggestive manner along with one picture of V1’s face. It contained text that stated in part, “Im a freak (water emoji) and ready for anything. Full service Incalls and Outcalls available. (no entry sign emoji) No AA. (no entry sign emoji) No pimps. (no entry sign emoji) No BB or BBJ Fetish Friendly Ready for role playing. Serious inquiries only. (smiling face with hearts emoji) Pick one girl or pick two girls (smiling face with hearts emoji).

8. Utilizing MV1’s social media account information and additional information gathered from public sources, law enforcement was able to identify an adult Hispanic male suspect reportedly in the company of MV1 who drove a black Charger with license plate number NSW-1397. The adult Hispanic male was identified as Cristian Morris. Records and video footage were obtained from a Motel 6 on 14811 Katy Freeway in Houston, Texas.

² MegaPersonals.com is an online platform popularly used in human trafficking and the human trafficking of minors.

³ MV1 verified herself in the images and further indicated that the images were posted online without her knowledge or consent.

⁴ The identification of V1 is known to law enforcement but is not being disclosed in this document to protect the identity of V1.

MV1 and Morris were observed in the video footage seen entering and exiting the same room on March 26, 2023 and March 27, 2023. Additionally, Morris provided the motel with his Texas driver's license and contact phone number (346) 744-3250 when renting that room.

9. On or about March 31, 2023, the father of V1 informed law enforcement that his daughter had been a victim of human trafficking for the past several years. V1's father believed Morris was a trafficker and was actively trafficking his daughter along with other female victims. V1's father provided law enforcement with screen shots of Morris's WhatsApp account, to include a photograph of Morris and the associated phone number (346) 744-3250.
10. On or about April 4, 2023, MV1 returned home and agreed to be interviewed. On or about April 5, 2023, MV1 participated in a Child Adolescent Forensic Interview at The Children's Assessment Center located at 2500 Bolsover Street, Houston, Texas. During this interview MV1 described being raped and robbed by a client during the performance of a commercial sex act. After this event, MV1 said her pimp (later to be identified as Morris) picking her up and taking her back to a hotel to get dressed, then immediately forcing her to engage in commercial sex again. After the conclusion of the interview, MV1 identified Cristian Morris by name, driver's license photo and black Charger with license plate number NSW-1397 as the individual who acted as her pimp for the last several weeks. Based on my training and experience, I know the term "pimp" is routinely used in the illicit sex industry to describe an individual who usually exerts control over and lives off the earnings of one or more "prostitutes" who are caused to engage in commercial sex acts. Pimps typically prey upon young girls, often underage runaways.

11. In a consensual review of the contents of MV1's cell phone, your affiant reviewed the

following text messages between MV1 and a contact saved as "morris" with phone

number (346) 744-3250: These text messages were exchanged on 3/17/2023

MV1 messages at 10:44:04PM stating "he's abt to cash app u".

MV1 messages at 10:44:10PM stating "Lmk when it went through"

Morris messages at 10:44:30PM stating "\$oficialmorris"

Morris messages at 10:45:41PM stating "He only send 50"

Based on my training and experience, I believe in the foregoing text message conversation, MV1 was performing sex acts for money and Morris was routing the money either to or through a CashApp account likely controlled by Morris. CashApp is a mobile payment service which can be operated using a cellular phone. Your affiant has observed recently, those engaged in sex trafficking have begun to use mobile banking services to accept payments for commercial sex acts.

- These text messages were exchanged on 3/26/2023

Morris messages at 3:21:38AM stating "U got the money already"

Morris messages at 3:21:57AM stating "?"

MV1 messages at 3:22:05AM stating "no"

Morris messages at 3:22:18AM stating "Get it always first"

Based on my training and experience, I believe in the foregoing text message

conversation, Morris is instructing MV1 to obtain money before performing a

commercial sex act with a client. This is common practice in the illicit sex industry.

12. Upon further reviews of MV1's cell phone, your affiant found a video dated 3/19/2023 in which MV1 describes being raped at gunpoint for the second time by a client. (See paragraph 10 wherein MV1 describes being raped by a client during an interview.) The following text messages sent to the contact "morris" with cell phone number (346) 744-3250 were also found on MV1's cell phone:

- These text messages were exchanged on 3/19/2023

MV1 messages at 8:27:02PM stating "can I work tmrw, I just wanna chill tn if that's okay. I know I needa work"

MV1 messages at 8:40:09PM stating "nbs he fucked my pussy up anyways I'm in pain"

13. Through the search of MV1's cell phone, MV1 sends the contact "morris" with phone number (346) 744-3250 a text message stating "im at the pearl inn" at approximately 9:58:52PM on 3/27/2023. Based on my training and experience, MV1 is referring to the Pearl Inn located at 11959 West Sam Houston Park South, Houston, Texas which is a popular motel in the area for conducting commercial sex dates. Your affiant was able to locate license plate reader data that recorded a vehicle with tag number NSW-1397 at location 9935a Bissonnett Street, Houston, Texas at approximately 09:00:24 PM on 3/27/2023. Bissonnett Street in Southwest Houston is notorious as a hub for prostitution and human trafficking. The vehicle with the tag number NSW-1397 is the black charger that MV1 identified as belonging to Morris. The vehicle with the tag number NSW-1397 is the black charger that can also be identified in photographs found on Morris's Instagram handle "officialmorris".

CONCLUSION

14. Based upon the information set forth above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Cristian Morris with violation of 18 U.S.C. § 1591(a)(1) , (b)(1) and (b)(2), which makes it a crime for someone who benefits financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.



Thelma Donchig

Special Agent

Federal Bureau of Investigations

Signed and sworn to before me telephonically this 22nd day of June 2023 and I find probable cause.



Honorable Judge Peter Bray

United States Magistrate Judge